

MELINDA HAAG (CABN 132612)  
United States Attorney

**Filed**  
JUN 05 2015  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CR No.: 12-00887-EJD
	)	
Plaintiff,	)	<u>VIOLATION</u> : 18 U.S.C. § 371—Conspiracy To
	)	Commit Extortion
v.	)	
	)	[SAN JOSE VENUE]
	)	
PATRICIA DELATORRE and	)	
JESUS SALINAS,	)	
	)	
Defendants.	)	

SUPERSEDING INFORMATION

The United States Attorney Charges:

COUNT ONE: (18 U.S.C. § 371)—Conspiracy To Commit Extortion)

1. Beginning in approximately June 2011 and continuing through approximately December 2012, in Santa Clara County, in the Northern District of California, and elsewhere, the defendants

PATRICIA DELATORRE and  
JESUS SALINAS,

did knowingly and intentionally conspire to commit acts and offenses against the laws of the United States, that is: extortion, in violation of 18 U.S.C. § 1951.

1           2. It was a part of the conspiracy that defendant Salinas entered into an agreement in June 2011  
2 by which Salinas agreed to bring the children of S.H. from the United States into Mexico in exchange  
3 for a payment of \$700.

4           3. It was further a part of the conspiracy that defendant Salinas took custody of the children in  
5 Mexico in July 2011.

6           4. It was further a part of the conspiracy that defendant Salinas failed to bring the children to the  
7 United States as he had promised, and instead, working with defendant Delatorre, concealed the children  
8 at the residence of Delatorre's mother, Maria Guadalupe Valenzuela Castaneda (Valenzuela) in Juarez,  
9 Mexico.

10           5. It was further a part of the conspiracy that defendant Salinas and defendant Delatorre told  
11 S.H. on numerous occasions that she needed to pay money to Salinas, Delatorre and, Delatorre's mother,  
12 Maria Guadalupe Valenzuela Castaneda, as a part of the scheme.

13           6. It was further a part of the conspiracy that Salinas, Delatorre and Valenzuela used the implied  
14 threat that Hernandez would not see her children again to extort money from her as part of the scheme.

15           7. It was further a part of the conspiracy that defendant Delatorre threatened to report S.H. to  
16 immigration authorities in the United States if she stopped paying money to Valenzuela.

17           Overt Acts.

18           8. On approximately July 15, 2011, defendant Salinas told S.H. that she needed to send money  
19 to Valenzuela in Juarez, Mexico.

20           9. On approximately September 14, 2012, defendant Delatorre told E.I. and J.B., representatives  
21 of S.H., that S.H. would not get her children back until S.H. paid more money.

1           10. On December 10, 2012, Valenzuela told S.H. in a telephone conversation that S.H. needed  
2 to send her money.


3  
4 All in violation of Title 18, United States Code, Section 371.

5  
6 DATED: 6/5/15

MELINDA HAAG  
United States Attorney

8  
9 

10 JEFFREY D. NEDROW  
Assistant United States Attorney

11  
12 (Approved as to form: )  
13 AUSA Nedrow

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT  
☒ SUPERSEDING
**OFFENSE CHARGED**

18 U.S.C. Section 371--Conspiracy To Commit Extortion

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

**PENALTY:**

Maximum five years imprisonment, \$250,000 fine, up to three years supervised release, \$100 special assessment fee

**PROCEEDING**Name of Complainant Agency, or Person (& Title, if any)  
FEDERAL BUREAU OF INVESTIGATION☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District
☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.Name and Office of Person  
Furnishing Information on  
THIS FORM

Melinda Haag

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

JEFFREY D. NEDROW

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA**DEFENDANT - U.S.**

PATRICIA DELATORRE

DISTRICT COURT NUMBER  
CR 12-00887-EJDFiled  
JUN 05 2015**IS NOT IN CUSTODY**1) ☐ Has not been arrested, pending outcome of this proceeding. If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)

Northern District of California (from original indictment)

**IS IN CUSTODY**4) ☒ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?☐ Yes  
☐ NoIf "Yes"  
give date  
filedDATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

DATE TRANSFERRED  
TO U.S. CUSTODY☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

AO 257 (Rev. 6/78)

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Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

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Month/Day/Year

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